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11 Attorneys for Defendants
12 TIMOTHY C. DRAPER and DRAPER ASSOCIATES V
13 CRYPTO LLC, a Delaware limited liability company

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

13 BRUCE MACDONALD, Individually and on
14 Behalf of All Others Similarly Situated,

15 Plaintiff,

16 vs.

17 DYNAMIC LEDGER SOLUTIONS, INC., a
18 Delaware corporation, TEZOS STIFTUNG, a
19 Swiss foundation, KATHLEEN BREITMAN,
20 an individual, ARTHUR BREITMAN, an
21 individual, TIMOTHY COOK DRAPER, an
individual, DRAPER ASSOCIATES,
JOHANN GEVERS, DIEGO PONZ, GUIDO
SCHMITZ-KRUMMACHER, BITCOIN
SUISSE AG, NIKLAS NIKOLAJSEN and
DOES 1-100, INCLUSIVE,

Defendants.

Case No. 3:17-cv-07095-RS

**JOINT STIPULATION REGARDING
SERVICE AND EXTENDING TIME FOR
TIMOTHY C. DRAPER AND DRAPER
ASSOCIATES V CRYPTO LLC TO
RESPOND TO COMPLAINT**

1 Defendants Timothy Draper and Draper Associates V Crypto LLC (collectively the
2 “Draper Defendants”) and Plaintiff Bruce MacDonald (“MacDonald”) hereby stipulate pursuant
3 to Civil L. R. 6-1(a) to extend the time for the Draper Defendants to respond to the putative class
4 action complaint filed by MacDonald (the “Complaint”) (Dkt. No. 1) in the above- captioned
5 action and to resolve issues related to service as follows:

6 WHEREAS, on December 13, 2017, MacDonald filed the Complaint;

7 WHEREAS, the Complaint names as a defendant an entity identified as “DRAPE
8 ASSOCIATES”, which Draper Associates V Crypto LLC contends does not exist and which it
9 presumes refers to it;

10 WHEREAS, Draper Defendants contend MacDonald has not yet served either of the
11 Draper Defendants with a summons or Complaint, and Plaintiffs contend both were served;

12 WHEREAS, the parties have met and conferred regarding the topic of service;

13 WHEREAS, in order to avoid motion practice with respect to service and for purposes of
14 judicial efficiency, the Draper Defendants agree to waive service of the summons and Complaint
15 as of the date of this Stipulation;

16 WHEREAS, the parties further agree that any prior deadline to respond to the Complaint
17 is vacated and pursuant to Civil L. R. 6-1(a), the Draper Defendants do not have any obligation to
18 respond to the Complaint until March 6, 2018;

19 WHEREAS, this stipulated extension will not alter the date of any event or any deadline
20 already fixed by order of this Court; and

21 WHEREAS, there have not been any previous time modifications in this case.

22 NOW, THEREFORE, the parties, hereby stipulate as follows:

- 23 1. The Draper Defendants shall waive service of the summons and Complaint; and
24 2. The Draper Defendants shall not be required to move to dismiss or otherwise
25 respond to the Complaint until March 6, 2018. Pursuant to Civil L. R. 6-1(a), this
26 paragraph shall be effective upon the filing of this Stipulation with the Court.

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1 **IT IS SO STIPULATED.**

2 Dated: January 8, 2018

3 HAGENS BERMAN SOBOL SHAPIRO LLP

4 By: /s/ Reed R. Kathrein

5 Reed R. Kathrein
6 Attorneys for Plaintiff BRUCE
7 MACDONALD

8 MANATT, PHELPS & PHILLIPS, LLP

9 By: /s/ Christopher L. Wanger

10 Christopher L. Wanger
11 Attorneys for Defendants TIMOTHY
12 DRAPER and DRAPER ASSOCIATES V
13 CRYPTO LLC

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2 **FILER'S ATTESTATION**
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4 Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, Christopher L.
5 Wanger hereby attests that concurrence in the filing of this document has been obtained from all
6 the signatories above.

7 Dated: January 8, 2018
8

9 s/ Christopher L. Wanger
10 Christopher L. Wanger
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